

## DRAFT

### ENGINEERING EVALUATION REPORT

<b>Plant Name:</b>	<b>CSL, Inc</b>
<b>Application Number:</b>	<b>14211</b>
<b>Plant Number:</b>	<b>17635</b>

#### **BACKGROUND**

The applicant is applying for a Permit to Operate for a Wipe Cleaning Operation. The applicant is requesting a Permit to Operate for the following equipment:

#### **S-2 Wipe Cleaning Operation**

#### **CUMULATIVE EMISSIONS**

For wipe cleaning operations it is assumed that 100 percent of the organic constituents will be emitted to the atmosphere. The facility is proposing to use a combination of up to 44 gallons per year of isopropyl alcohol, and up to 44 gallons per year of acetone.

At a maximum potential not to exceed 10 lb/day of precursor organic compounds, the facility can use up to the following amounts of solvents:

<b>CODE</b>	<b>SOLVENT</b>	<b>GPY</b>	<b>DENSITY</b>	<b>LB/YEAR</b>	<b>LB/DAY</b>
<b>157</b>	<b>Isopropanol</b>	<b>275</b>	<b>6.526</b>	<b>1794.65</b>	<b>4.91</b>
<b>455</b>	<b>Acetone</b>	<b>275</b>	<b>6.601</b>	<b>1815.275</b>	<b>4.97</b>
		<b>TOTAL POC EMISSIONS/DAY =</b>			<b>9.88</b>

Based on maximum potential to emit, the source will have the following emission rates:	<i>New</i>	<i>New</i>	<i>New</i>	<i>New</i>	<i>Total</i>
<i>Source S-2</i>	<i>lb/day POC</i>	<i>lb/day NPOC</i>	<i>ton/yr POC</i>	<i>ton/yr NPOC</i>	<i>ton/yr</i>
<b>Application Total</b>	<b>9.88</b>	<b>0</b>	<b>1.81</b>	<b>0</b>	<b>1.81</b>
<b>Previous Site Total</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<b>New Site Total</b>	<b>9.88</b>	<b>0</b>	<b>1.81</b>	<b>0</b>	<b>1.81</b>

### **Applicable Requirements**

The sources covered in this application are not currently subject to any New Source Performance Standards (NSPS) or National Emission Standards for Hazardous Air Pollutants (NESHAPS).

#### **A. Toxic Risk Assessment**

The solvents used at the source covered by this application will comply with District's Toxic Risk Management Policy by emitting toxic compounds in quantities less than the risk screen trigger levels listed in Table 2-1-316. Therefore, a toxic risk screen is not required and TBACT does not apply.

<b>ISOPROPYL ALCOHOL</b>		
	<b>Trigger Level</b>	<b>Actual Emissions</b>
<b>Chronic (lb/yr)</b>	<b>270,000</b>	<b>1795</b>
<b>Acute (lb/hr)</b>	<b>7.1</b>	<b>0.6</b>

#### **B. New Source Review - Regulation 2, Rule 2**

##### **1. Best Available Control Technology Requirements (2-2-301)**

A Best Available Control Technology (BACT) review is required for any new or modified source which results in a cumulative emissions increase for POC, NPOC, NO<sub>x</sub>, SO<sub>2</sub>, PM<sub>10</sub>, or CO of greater than 10 pounds per highest day since April 5, 1991 or which results in a cumulative increase since 1982, which exceeds the emission rate of a pollutant listed in Regulation 2-2-301.1.

The proposed source S-2, Wipe Cleaning Operations, does not emit more than 10 pounds of any criteria pollutant.. Therefore, BACT is not required.

##### **2. Offset Requirements (2-2-302)**

Total facility emissions, including this project, will be less than 15 tons per year of POC or NO<sub>x</sub> per source. Therefore, offsets are not required.

##### **3. PSD (Prevention of Significant Deterioration) Requirements (2-2-304)**

Wipe Cleaning Operation is not one of the 28 PSD source categories listed in Section 169(1) of the Federal Clean Air Act. Therefore, PSD will not apply unless the facility has emissions of 250 tons per year or more of a regulated air pollutant. This facility will emit less than 250 tons per year of pollutants; therefore, PSD does not apply.

Wipe cleaning operations are subject to the record keeping requirements of Regulation 8-16 "Solvent Cleaning Operations" and the storage and disposal requirements of Regulation 8-1 "General Provisions." The Wipe Cleaning Operation, S-2, will comply with 8-1-320 by using closed containers to store all fresh or spent solvents or solvent impregnated materials and with 8-16-501.2 by summarizing records on a quarterly basis.

I recommend that an Authority to Construct be waived and a Permit to Operate be issued for the following source:

subject to Condition #23046.

By Catherine S Fortney Date 5/24/06

COND# 23046 -----

1. Usage of wipe cleaning solvent at Source S-2 shall not exceed the following limits in any consecutive 12-month period:
  - a. 275 gallons of isopropyl alcohol; and
  - b. 275 gallons of acetone. [Cumulative increase]
2. Total solvent usage of wipe cleaning solvent at Source S-2 shall not exceed a total of 10 pounds of precursor organic compounds per any consecutive 24-hour period. [Cumulative increase]
3. Materials other than the materials specified in Conditions 1 and 2 may be used at Source S-2, provided that the Permit Holder can demonstrate that both of the following are satisfied:
  - a. Operations meet BACT as described in the District's BACT/TBACT Guidelines; and
  - b. The use of these materials does not increase emissions above any risk screening trigger level as set out on Regulation 2, Rule 5, Table 2-5-1. [Cumulative increase; Regulation 2, Rule 5]
4. In order to minimize solvent losses, Permit Holder shall use only small squeeze bottles to dispense solvent for wipe cleaning. In addition, all solvent-impregnated cloths or papers not in active use shall be kept in closed containers. [Reg 8-1]
5. To determine compliance with the above conditions, the Permit Holder shall maintain the following records and provide all of the data necessary to evaluate compliance with the above conditions, including the following information:
  - a. Type and monthly usage of all POC- and NPOC-containing materials used;
  - b. If materials other than those specified in Condition 1 are used, POC, NPOC, and toxic component contents of each material used; and mass emission calculations to demonstrate compliance with Condition 2 on a monthly basis; and
  - c. Annual solvent usage and emission calculations on a rolling 12-month basis. [Cumulative Increase; Regulation 2, Rule 5]